

# Ohio EPA

State of Ohio Environmental Protection Agency

## Southeast District Office

2195 Front Street  
Logan, Ohio 43138-9031  
(740) 385-8501  
FAX (740) 385-6490

Ted Strickland  
Governor

### FACSIMILE TRANSMISSION COVER SHEET

FAX NO. (740) 385-6490

DATE: 4/30/07

TO: Mike Beedle

FAX NUMBER: 312-353-4342

FROM: Rich PHONE NUMBER: (740) 380-

NUMBER OF PAGES INCLUDING COVER SHEET: 6

SENDER/CALL BACK PERSON: Rich Stewart

TELEPHONE NUMBER: 740-353-4342

SPECIAL INSTRUCTIONS: Clow's Response to previous complaint and  
new complaint.

**IF YOU DO NOT RECEIVE ALL OF THE PAGES PROPERLY, PLEASE**  
**CONTACT SENDER/CALL BACK PERSON AS SOON AS POSSIBLE**

**CLOW**

CLOW WATER SYSTEMS COMPANY

2007 APR 26 AM 10:55

April 25, 2007

2266 South Sixth Street  
P.O. Box 6001  
Coshocton, Ohio 43812-6001  
(740) 622-6651  
FAX (740) 622-8551Mr. Rich Stewart  
Environmental Specialist  
Ohio EPA, DHWM  
2195 Front Street  
Logan, OH 43138Re: April 4, 2007 Inspection  
Clow Water Systems Company

Dear Mr. Stewart:

As you know, your April 4, 2007 inspection referenced above focused on a roll-off box of materials stored next to our wastewater treatment plant. Clow had collected a sample of this material on April 4, 2007 prior to your inspection. As revealed by the sample results that we faxed to you and as stated in my letter dated April 16, 2007, the sample was hazardous for lead. This material has since been disposed of at Envirite, and a copy of the hazardous waste manifest is attached.

Please accept this letter updating and amending the information contained in my prior April 16 letter and responding to the questions asked in your e-mail of that same date.

Based on our discussions with the employees who actually performed the work, to the best of our knowledge and belief, the contents of the roll-off that was the subject of your April 4 inspection were generated on December 19, 2006. On that day, the bottom was dropped in the cupola, and the resulting material commonly known as "cupola bottom drop" was cleared and taken to the waste bunker for disposal. During this process, an area of the upper cupola stack needing repair was identified. The affected area was located above the orifice ring. The crew that ascended inside the cupola on a hoist to perform repairs partially cleared the orifice ring on the way up to enable the hoist to pass. During descent, they stopped and finished clearing the remainder of the material that had accumulated on and around the orifice ring. All of the material — the brick and other materials from the cupola upper stack repair and the accumulated material from the orifice ring — was cleaned up and ultimately placed in the roll-off box that you observed on April 4, 2007. December 19, 2006 was the first time the upper cupola orifice ring had ever been cleaned. Although the bottom was also dropped in October, 2006 as previously reported, the upper cupola orifice ring was not cleaned at that time.

The cupola bottom was next dropped on February 23, 2007. Again, the bottom drop material was cleared and taken to the waste bunker for disposal. Next, the iron/slag skull was cut from the cupola side walls and allowed to drop to the bottom. The orifice ring was then cleaned, and the clean-out material fell onto and mixed with the iron/slag skull material that was still lying at the bottom of the cupola. While we do not know the exact amount of material cleaned

Mr. Rich Stewart  
April 25, 2007  
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from the orifice ring in February, estimates by those who performed the task are less than 0.5 tons. All of this mixed material was taken to the charge yard, where it was subsequently re-charged to the cupola.

As I previously informed you, we next dropped the cupola bottom on April 19, 2007. There was approximately 12 tons of cupola bottom drop material generated. This waste was sampled and sent for analysis. Separately, the cupola orifice ring was again cleaned. There were approximately 2.2 tons of material. It was likewise sampled and sent for analysis. Results from these sampling events are expected early next week and will be forwarded to you upon receipt. In the future, we will continue to collect and characterize the upper stack orifice ring clean-out materials separately. As necessary, it will be managed as a hazardous waste.

Lastly, you asked in your April 16, 2007 e-mail where precipitation that is collected on the pad where the roll-off that was the subject of your 04/04/07 inspection goes. It is captured and pumped back to our waste-water treatment plant.

We appreciate your patience as we assembled the information set out above. Please do not hesitate to let me know if you need any further information or have any additional questions.

Sincerely,



Heather A. Klesch  
Environmental Manager  
Clow Water Systems Company

Form Approved, OMB No. 2050-0030

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number 2015700012015700		2. Page 1 of 1		3. Emergency Response Phone		4. Manifest Tracking Number 001587210 FLE		Form Approved, OMB No. 2050-0039	
5. Generator's Name and Mailing Address City of New York 330 West 14th St. New York, NY 10011-4211		Generator's Site Address (if different than mailing address)									
Generator's Phone: (212) 312-1234		6. Transporter 1 Company Name Barnes & Noble		7. Transporter 2 Company Name		U.S. EPA ID Number MICHIGAN-000001					
8. Designated Facility Name and Site Address Barnes & Noble 330 West 14th St. New York, NY 10011-4211		Facility's Phone: (212) 312-1234		U.S. EPA ID Number							
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity		12. Unit Wt./Vol.		13. Waste Codes	
				No. Type							
X		1. RCRA Hazardous Waste, Solid, Aqueous, Flammable, Corrosive, Toxic, Infectious, etc.									
		2.									
		3.									
		4.									
14. Special Handling Instructions and Additional Information 961-096920 - DRG #171											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name Heather A. Klesch				Signature Heather A. Klesch				Month Day Year 10/24/07			
16. International Shipments <input type="checkbox"/> Import to U.S.				<input type="checkbox"/> Export from U.S.				Port of entry/exit: Date leaving U.S.:			
17. Transporter Acknowledgment of Receipt of Materials											
Transporter 1 Printed/Typed Name Barnes & Noble				Signature Barnes & Noble				Month Day Year 10/24/07			
Transporter 2 Printed/Typed Name				Signature				Month Day Year			
18. Discrepancy											
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number:											
18c. Signature of Alternate Facility (or Generator) Month Day Year											
Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Month Day Year											
m 8700-22 (Rev. 3-05) Previous editions are obsolete.											

OHIO ENVIRONMENTAL PROTECTION AGENCY

TELEPHONE MEMORANDUM

WITH Anon Complainant DATE 4/25/07  
REPRESENTING \_\_\_\_\_ TIME 14:30  
PERMIT NO. \_\_\_\_\_ PHONE \_\_\_\_\_  
OEPA STAFF R. Stewart  
SUBJECT Clow hazardous waste violations

NOTES & SUMMARY:

FOLLOW-UP DATE

Complainant states Clow had a pipe break between the ~~exposed~~ scrubber water cooling tower and the cooling tower strainer, lost 130,000-170,000 gals scrubber water to the "Red Sea" area, the ~~scrubber~~ <sup>marine</sup> marine behind the WWTP, where pipe is now stored. This area has received wastewater releases historically. C. (former employee) filled out internal spill report and called Heather Klesch (Env. Rep. for Clow). Heather called him back ~~20~~ 20 minutes later and said not to call in upon wasn't necessary, and was n't <sup>(was non-potable water)</sup> scrubber water. C. said reports go to Heather, my still have. Also said to check maintenance log in Maintenance office - all repairs, leaks should be noted in it. ~~Was~~ Occurred on a Sunday night @ 10 PM. (over

This occurred prior to the end of February when C was terminated. Occurred just after Heather became full env. rep (after interim manager).

C. also said non-contact + scrubber water were often mixed, systems connected down hill by NC on recycle water pit and at WWTP. Process Storage Tanks (blue tanks by NC water pit) ~~also~~ had scrubber water in them, placed into NC system. For maintenance on pipe breaks - scrubber water was ~~added~~ to the NC system. Often had scrubber overflows. NC system would turn brown + foam up when scrubber water went into it.

> For solids from cupola duct cleaning - <sup>clay</sup> knew was haz. - collected and put in grinder to reduce size to  $< 1/4"$  so they could pump through the WWTP. Grinder broke after 3 months, don't know whose was to blame for past year. MPW came to clean out, at least once left pile of it on pavement next to grinder.

> C. said Heather knew how long roll off box of waste was stored at the WWTP, WWTP discussed it with her more than once at the weekly plant meetings.

> Don Elson at WWTP, knows a lot.

R. Stewart